

damages;

29. This plaintiff intends to claim punitive damages for all counts;
30. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

FOURTH COUNT - INVASION OF PRIVACY ON

BEHALF OF JOCELYN VASQUEZ

31. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 30 as though fully set forth herein at length;
32. The aforementioned occurrence constituted an invasion of privacy of this plaintiff;
33. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
34. This plaintiff intends to claim punitive damages for all counts;
35. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

FIFTH COUNT - CIVIL RIGHTS VIOLATION ON

BEHALF OF JOCELYN VASQUEZ

36. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 35 as though fully set forth herein at length;
37. As a result of the aforementioned occurrence this plaintiff was deprived of her civil rights under the Constitution of the United States and the Constitution of the

State of New York as well as other State ordinances, statutes, codes, and rules, including but not limited to 42USC §1981, §1983, §1985, §1988 and 28USC §134

38. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
39. This plaintiff intends to claim punitive damages for all counts;
40. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

SIXTH COUNT NEGLIGENCE ON

BEHALF OF JOCELYN VASQUEZ

41. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 40 as though fully set forth herein at length;
42. The aforementioned occurrence took place as a result of the negligence of the defendants including but not limited in the defendant "CITY"'s negligent hiring practice of its' employees including the defendants herein;
43. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
44. This plaintiff intends to claim punitive damages for all counts;
45. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New

York and in excess of the jurisdictional limits of all inferior Courts;

SEVENTH COUNT - PRIMA FACIE TORT

ON BEHALF OF JOCELYN VASQUEZ

46. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 45 as though fully set forth herein at length;
47. The defendants, without justification, intentionally acted to physically and emotionally harm this plaintiff,
48. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
49. This plaintiff intends to claim punitive damages for all counts;
50. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

EIGHTH COUNT - BATTERY ON

BEHALF OF JOCELYN VASQUEZ

51. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 50 as though fully set forth herein at length;
52. This plaintiff, without cause, provocation or justification, was brutally battered by the police officers at the scene, including but not limited to the defendants;
53. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;

- 54. This plaintiff intends to claim punitive damages for all counts;
- 55. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**NINTH COUNT - MUNICIPAL LIABILITY ON
BEHALF OF JOCELYN VASQUEZ**

- 56. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 55 as though fully set forth herein at length;
- 57. The defendants caused this plaintiff to be arrested in the absence of any evidence of criminal wrongdoing. Notwithstanding their knowledge that said arrest and incarceration would jeopardize the plaintiffs liberty, well being, safety and constitutional rights;
- 58. The acts complained of were carried out by the aforementioned individual defendants in their capacities as police officers and officials, with all of the actual and/or apparent to do so;
- 59. The acts complained of were carried out by the individual defendants in their capacities as police officers and officials pursuant to the customs, policies, practices, usages, procedures, and rules of the defendant "CITY" and "POLICE", all under the supervision of ranking officers of said department;
- 60. The aforementioned customs, policies, usages, practices, procedures and rules of the defendant "CITY" and "POLICE" include, but are not limited to the following unconstitutional practices:
 - a) fabricating evidence against innocent persons erroneously arrested